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STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES
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August 28, 1995

Mr. Randy Sturgeon (3HW42)
U.S. EPA Region III
Chestnut Building, 9th Floor
Philadelphia, PA 19107

RE: Dover Gas Light Site

Dear Mr. Sturgeon:

This letter comprises responses to three recent documents

- Your letter of August 11 requesting the State's position on future use of the Dover Gas Light Site.
- The alternative focused feasibility study prepared by Chesapeake.
- The Remedial Design Work Plan prepared by Chesapeake.

Future use
There is an agreement between the State of Delaware and Chesapeake that the site would not become a building site that the Superfund Branch was not aware of when the ROD was issued. Although the foot print required for the desired museum expansion would be only a few thousand square feet of the relatively uncontaminated southern end of the site, the State and Chesapeake do not intend to amend the 1986 agreement.

Focused feasibility study
Chesapeake's focused feasibility study underestimates the extent of product in the vadose zone of the site. Figure 2 of the study compares analytical results of sampling to cleanup levels. This representation makes it appear that the heavy contamination is relatively limited in extent. In fact, the most heavily contaminated samples in this study were identified visually and not sent to the lab for analysis. These samples were logged by a qualified geologist and frequently contain

descriptions such as "oil sheen on spoon," "tar staining," or "coal tar odor." (See the Versar Interim Report "On-site Borings.")

Alternative 1 of the focused feasibility study leaves the contaminated soil and free product in place under an asphalt cap. While the cap eliminates exposure, this alternative foregoes the opportunity to significantly reduce the volume of contamination in the environment.

Alternative 2 as proposed by Chesapeake would excavate the gas holders but leave other free product in the ground. A problem with this plan is that the gas holders may not be the area of highest concentration or volume of coal tar. At another recently excavated coal gas site in Delaware, the brick gas holder was found to be in excellent condition. It had a thick clay bottom and there was no evidence of leakage outside the foundation. The contamination was effectively contained. If that is also the case at the Dover site, then effort would be better directed at removing the pockets of uncontained product rather than what is in the holders.

The uncertainties around the extent of contamination in the vadose zone suggest that it may be better to wait until after further soil investigation to make changes to the ROD. This is especially true if Chesapeake is unwilling to accept the validity of the sample descriptions discussed above. The project schedule in the design work plan shows that the soil remediation design does not even begin until the soil investigation is completed and reviewed by EPA. It then proceeds for 6 months before the start of the NAPL recovery design. If an ESD to the ROD were required, it may take three to four months. Chesapeake could begin the soil remediation design after the ESD is signed and finish it concurrently with the NAPL recovery design without pushing back project completion. In short, there would be little lost and potentially much to gain by keeping options open until the proposed investigation is completed.

Design work plan
The State agrees with your approval of the outline submitted by Chesapeake.

Please call if you have any questions or comments. Thank you.

Sincerely,

Stephen F. Johnson
Environmental Engineer

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